

DAVID CHIU, State Bar #189542  
City Attorney  
YVONNE R. MERÉ, State Bar #173594  
Chief Deputy City Attorney  
TARA M. STEELEY, State Bar #231775  
JOHN H. GEORGE, State Bar #292332  
KAITLYN M. MURPHY, State Bar #293309  
SABRINA M. BERDUX, State Bar #248927  
ABIGAIL H. WALD, State Bar #309110  
Deputy City Attorneys  
City Hall, Room 234  
1 Dr. Carlton B. Goodlett Place  
San Francisco, California 94102-4682  
Telephone: (415) 554-4655 (Steeley)  
(415) 554-5960 (George)  
(415) 554-6762 (Murphy)  
(415) 554-3929 (Berdux)  
(415) 554-3901 (Wald)  
Facsimile: (415) 554-4699  
E-Mail: tara.steeley@sfcityatty.org  
john.george@sfcityatty.org  
kaitlyn.murphy@sfcityatty.org  
sabrina.m.berdux@sfcityatty.org  
abigail.wald@sfcityatty.org

Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an individual; JOHN ROE, an individual; BARBARA ROE, an individual; PHOENIX HOTEL SF, LLC, a California limited liability company; FUNKY FUN, LLC, a California limited liability company; and 2930 EL CAMINO, LLC, a California limited liability company,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a California public entity,

Defendant.

Case No. 4:24-cv-01562-JST

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING DISCOVERY MOTIONS  
DEADLINE BY FOUR DAYS**

Trial Date: August 10, 2026

**STIPULATION**

WHEREAS, the fact discovery cutoff was January 5, 2026 (ECF No. 99).

WHEREAS, Civil Local Rule 37-3 provides “[w]here the Court has set separate deadlines for fact and expert discovery, no motions related to fact discovery may be filed more than 7 days after the fact discovery cut-off.”

WHEREAS, under Civil Local Rule 37-3, the last day to file discovery motions related to fact discovery is January 12, 2026.

WHEREAS, the parties are attempting to resolve two remaining discovery disputes related to fact discovery, but Plaintiffs’ counsel is unable to meet and confer until on or after January 12, 2026 due to his travel schedule.

WHEREAS, Magistrate Judge Illman’s Standing Order Section 4(b) provides the procedure for a party to enforce the Court’s meet and confer requirement when the moving party cannot obtain a meeting with the opposing party or its section of a joint discovery letter.

WHEREAS, the parties prefer to seek a brief extension of the Civil Local Rule 37-3 deadline and attempt to resolve their disputes instead of burdening the Court with Defendant’s unilateral filing pursuant to Judge Illman’s Standing Order.

THEREFORE, IT IS HEREBY AGREED AND STIPULATED that:

1. The deadline provided by Civil Local Rule 37-3 for motions related to fact discovery is extended by four days from January 12, 2026 to January 16, 2026.

Dated: January 12, 2026

DAVID CHIU  
City Attorney  
TARA M. STEELEY  
JOHN H. GEORGE  
KAITLYN M. MURPHY  
SABRINA M. BERDUX  
ABIGAIL H. WALD  
Deputy City Attorneys

By: /s/John H. George  
JOHN H. GEORGE  
Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

1  
2 Dated: January 12, 2026

WALKUP, MELODIA, KELLY & SCHOENBERGER

3 By: \*\* /s/Ashcon Minoiefar  
4 ASHCON MINOIEFAR

5 Attorneys for Plaintiffs

6 JANE ROE, MARY ROE, SUSAN ROE, JOHN ROE,  
BARBARA ROE, PHOENIX HOTEL SF, LLC, FUNKY  
FUN, LLC, and 2930 EL CAMINO, LLC

7 *\*\*Pursuant to L.R. 5-1(h)(3), the electronic signatory attests that each of the other Signatories have*  
8 *concurred in the filing of this document.*  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[~~PROPOSED~~] ORDER**

Pursuant to the parties' stipulation, and for good cause shown, the deadline provided by Civil Local Rule 37-3 for motions related to fact discovery is extended by four days from January 12, 2026 to January 16, 2026.

Date: January 13, 2026



\_\_\_\_\_  
The Honorable Jon S. Tigar

UNITED STATES DISTRICT COURT